

FILED

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2025 MAY 19 PM 2:45

CLERK'S OFFICE - LOS ANGELES
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES

BY: JB **ORIGINAL**

7 Attorneys for Defendant
8 MAKSIM ZAITSEV

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 MAKSIM ZAITSEV,

17 Defendant.

18 Case No. 2:25-cr-00154-SPG

19 **EXHIBITS D AND G IN SUPPORT**
20 **OF MOTION TO DISMISS**
21 **INDICTMENT FOR GOVERNMENT**
22 **MISCONDUCT (DKT. 91)**

23 Maksim Zaitsev, through his counsel of record, Deputy Federal Public Defenders
24 Shannon Coit and Ryan Shelley, hereby submits Exhibit D and G, which are surveillance
25 videos, in support of his Motion to Dismiss the Indictment for Government Misconduct
26 (Dkt. 91) for the Court's consideration in this case.

27 Respectfully submitted,

28 CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: May 19, 2025

By /s/ Shannon Coit

29 Shannon Coit
30 Ryan Shelley
31 Deputy Federal Public Defenders
32 Attorneys for Maksim Zaitsev

PROOF OF SERVICE

I, Amadeus Duran, declare that I am a resident or employed in Los Angeles County, California; that my business address is the Office of the Federal Public Defender, 321 East 2nd Street, Los Angeles, California 90012-4202, Telephone No. (213) 894-2854; that I am over the age of eighteen years; that I am not a party to the action entitled above; that I am employed by the Federal Public Defender for the Central District of California, who is a member of the Bar of the State of California, and at whose direction I served a copy of the attached **EXHIBITS D AND G IN SUPPORT OF MOTION TO DISMISS INDICTMENT FOR GOVERNMENT MISCONDUCT (DKT. 91)** on the following individual(s) by:

Placing same in a sealed envelope for collection and interoffice delivery addressed as follows: Placing same in an envelope for hand delivery addressed as follows: Placing same in a sealed envelope for collection and mailing via the United States Post Office addressed as follows: Faxing same via facsimile machine addressed as follows:

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This proof of service is executed at Los Angeles, California, on May 19, 2025.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Amadeus Duran .
Amadeus Duran

